



**LOUISVILLE METRO
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204**



**xx xx, 2013
FEDDOOP Statement of Basis**

Company: Color Corporation of America

Plant Location: 1630 West Hill Street, Louisville, Kentucky 40210

Date Application Received: 05/27/2014

Date of Draft Permit: 06/03/2014

Date of Public Notice: 06/03/2014

District Engineer: Shannon Hosey

Permit No: 57-97-F (R3)

Plant ID: 152

SIC Code: 2851

NAICS: 32551

AFS: 00152

Introduction:

This permit will be issued pursuant to District Regulation 2.17, *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}). Part of the county is non-attainment for sulfur dioxide (SO₂).

Application Type/Permit Activity:

☐ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☒ Permit Renewal

Compliance Summary:

☒ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

☒ Source is operating in compliance

I. Source Information

1. **Source Description:** Color Corporation manufactures coatings.
2. **Emission Unit Summary:** Color Corporation operates three emission units.

Emission Unit	Equipment Description
U1	<p>One (1) paint packing operation, consisting of one (1) quart and gallon filling line (E16) and one (1) five gallon can filling line (E17).</p> <p>One (1) paint thinning operation, consisting of one (1) 2600 gallon letdown tank with 150 HP mixer (E50), one (1) 2000 gallon letdown tank with one (1) 100 HP mixer (E11), one (1) 1200 gallon letdown tank with one (1) with 60 HP mixer (E12), one (1) 1000 gallon letdown tank with one (1) 60 HP mixer (E13), one (1) 50 HP portable mixer (E14) and one (1) tote wash equipment (E15).</p> <p>One (1) paint milling operation, consisting of one (1) 150 liter mill (E6), one (1) 100 liter mill (E7), two (2) 50-64 liter mills (E8A and E51), one (1) 50 liter mill (E8B), two (2) 10 liter mills (E9A and E9B), and one (1) 60 liter mill (E10)</p> <p>One (1) paint mixing operation, consisting of three (3) 1000 gallon premix tanks with two 125 HP mixers (E1 and E2) and one 100 HP mixer (E3), two (2) 300 gallon portable dispenser each with a 50 HP mixer (E4 and E5), one (1) 18000 gallon premix tank with 200 HP mixer (E52).</p>
U5	<p>Tank farm consisting of four (4) storage tanks 8,000 gallons each all of which are bottom fill and equipped with conservation vents (E18 – E21).</p> <p>Two (2) storage vessels (2,495 gallons each) designated as Tank 206 (E22) and Tank 207 (E23) for storing raw materials SU022M (35% n-butyl acetate) and SU0109M (35% propylene glycol monomethyl ether acetate)(Construction Permit – 357-06-C).</p> <p>One (1) solvent recovery system consisting of a 300 gallon “dirty” solvent storage tank (E25), a solvent distillation unit (E24), and a 200 gallon reclaimed (clean) solvent storage tank (E26) (Construction Permit – 695-08-C).</p> <p>One (1) Hockmeyer Model CMX-100 automatic washing system including one (1) 320 gallon solvent recycle tank (Construction Permit – 240-06-C).</p> <p>Three (3) Basket Mills, BM2, BM3, and BM4, Hockmeyer Model HCP-20, 2000 lb/hr each (Construction Permit – 75-10-C).</p> <p>Two (2) process letdown tanks, 2,400 gallon capacity (2,100 gallon working capacity), manufacturer Custom Metal Craft (E43 and E44)</p>

Emission Unit	Equipment Description
	(Construction Permit – 35050-12-C). Three (3) Storage Tanks designated as Tank 204 (E56), Tank 205 (E57) and Tank 209 (16,900 gallons) (E58).
U8	Two (2) site-constructed spray booths with dry filters. One (1) table top QC Spray Booth.

3. **Fugitive Sources:** There are no fugitive emissions.

4. **FEDDOOP Permit 57-97-F (R3) Revisions/Changes:**

Revision	Issue Date	Public Notice Date	Type	Description
N/A	04/22/1997	03/16/1997	Initial	Initial Permit Issuance
R1	04/04/2000	03/05/2000	Minor	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
R2	04/16/2002	02/17/2002	Significant	Permit Renewal; Incorporate Construction Permit 37-00-C
R3	xx/xx/20xx	06/03/2014	Renewal	Permit Renewal; Incorporate Construction Permits 357-06-C, 240-06-C, 695-08-C and 37364-13-C

5. **Emission Summary:**

Pollutant	Actual Emissions (tpy) 2009 Data	Pollutant that triggered major source status
CO	1.624	No
NO _x	1.934	No
SO ₂	0.012	No
PM/PM ₁₀	1.053	No
VOC	21.15	Yes
GHG (CO ₂ e)	Not available	No
Single HAP > 1 tpy	All individual HAPs < 1 tpy	Yes
Total HAPs	2.616	Yes

6. **Applicable Requirements:**

☐ PSD ☐ 40 CFR 60 ☒ SIP ☒ 40 CFR 63
☐ NSR ☐ 40 CFR 61 ☒ District-Origin ☐ Other

7. **Future MACT Requirements:** N/A

8. **Referenced Federal Regulations in Permit:** None

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

2. **Stratospheric Ozone Protection Requirements:** This source does not manufacture, sell, or distribute any of the chemicals listed in title VI of the CAAA. Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. Basis of Regulation Applicability

Regulation	Basis for Applicability
2.17	Establishes procedures for issuing Federally Enforceable District Origin Operating Permits
6.09	Establishes emission standards for processes that emit PM which were constructed before September 1, 1976
6.13	Applicable to each VOC storage vessel that commences construction or modification before April 19, 1972, and has a storage capacity greater than 250 gallons
6.24	Applies to any affected facility using any organic materials which was in being prior to June 13, 1979.
7.08	Establishes emission standards for processes that emit PM which were constructed after September 1, 1976
7.12	Applies to storage tanks with a capacity greater than 250 gallons constructed after April 19, 1972
7.25	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and apply to new processes commenced after June 13, 1979
40 CFR 63 CCCCCCC	Applies if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP

a. **Plant-wide major source limits**

Color Corporation of America requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and < 5.0 tpy of largest single HAP, to be a FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. **Equipment:**

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
U1	E1	1000 Gallon Premix Tank with 125 HP Mixer	6.09, 6.24 and 40 CFR 63 Subpart CCCCCCC	C1
	E2	1000 Gallon Premix Tank with 125 HP Mixer		
	E3	1000 Gallon Premix Tank with 100 HP Mixer		
	E4	300 Gallon Portable Dispenser with 50 HP Mixer		
	E5	300 Gallon Portable Dispenser with 50 HP Mixer		
	E6	150 Liter Mill	6.09, 7.25 and 40 CFR 63 Subpart CCCCCCC	
	E7	100 Liter Mill		
	E8A	50-64 Liter Mill		
	E8B	50 Liter Mill		
	E9A	10 Liter Mill		
	E9B	10 Liter Mill		
	E10	60 Liter Mill		
	E11	2000 Gallon Letdown Tank with 100 HP Mixer	6.24 and 40 CFR 63 Subpart CCCCCCC	N/A
	E12	1200 Gallon Letdown Tank with 60 HP Mixer		
	E13	1000 Gallon Letdown Tank with 60 HP Mixer		
	E14	50 HP Portable Mixer		
	E15	Tote Wash Equipment		
E16	Quart and Gallon Filling Line			
E17	Five Gallon Can Filling Line			

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
	E50	2600 Gallon Letdown Tank with 150 HP Mixer	7.25 and 40 CFR 63 Subpart CCCCCCC	C1
	E51	50-64 Liter Mill		
	E52	1800 Gallon Premix Tank with 200 HP Mixer		
	E53	50 HP Basket Mill		
	E54	25 HP Mixer		
	E55	10 HP Mixer for Drums		
U5	E18	8000 Gallon Bottom Fill Storage Tank	6.13	N/A
	E19	8000 Gallon Bottom Fill Storage Tank		
	E20	8000 Gallon Bottom Fill Storage Tank		
	E21	8000 Gallon Bottom Fill Storage Tank		
	E22	SU022M (35% n-butyl acetate) Storage Tank 206 2,495 Gallons	7.12	
	E23	SU0109M (35% propylene glycol monomethyl ether acetate) Storage Tank 207 2,495 Gallons		
	E24	Solvent Distillation Unit	7.25	
	E25	300 Gallon “Dirty” Solvent Storage Tank	7.12	
	E26	200 Gallon Reclaimed (Clean) Solvent Storage Tank		
	E27	Automatic Washing System	7.25 and 40 CFR 63 Subpart CCCCCCC	
	E28	320 Gallon Solvent Recycle Tank		
	E29	Basket Mill BM2, 2000 lb/hr		
	E30	Basket Mill BM3, 2000 lb/hr		
	E31	Basket Mill BM4, 2000 lb/hr		
	E43	Process Letdown Tank, 2,400 gallon capacity		
	E44	Process Letdown Tank, 2,400 gallon capacity		
	E56	Storage Tank 204		
	E57	Storage Tank 205		
	E58	Storage Tank 209, 16,900 Gallons		
U8	E45	Spray Booth with Filters	6.09 and 6.24	N/A
	E46	Spray Booth with Filters		
	E47	QC Spray Booth	7.08 and 7.25	

c. **Standards/Operating Limits**

i. **VOC**

- 1) VOC emissions from the equipment cannot exceed 100 tons, plant-wide, during any consecutive 12-month period per Regulation 2.17.
- 2) VOC emissions from equipment subject to Regulation 7.25 cannot exceed ten (10) tons, plant-wide, during any consecutive 12-month period unless a BACT is submitted and approved.
- 3) Regulation 6.24 limits the pound per hour and pound per day emissions of Class II and Class III Solvents.
- 4) Regulations 6.13 and 7.12, section 3.3 require submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater.

ii. **Opacity**

Regulation 6.09, section 3.3.1 and Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%

iii. **PM**

For emission points subject to Regulation 6.09 and Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2 and 3.2. The equation to calculate the hourly PM emission limit is $E = 4.10 P^{0.67}$ for 6.09 or $E = 3.59 * P^{0.62}$ for 7.08, where E is the allowable lb/hr PM emission limit and P is the process weight rate expressed in tons/hr.

iv. **HAP**

- 1) Regulation 2.17, section 5.1 establishes the requirement to include specific conditions in the permit to limit the plant-wide emissions of individual and total combined HAPs to avoid Title V permitting.
- 2) Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart CCCCCC and is required to comply with section 63.11601.

d. **Monitoring and Record Keeping**

i. **VOC**

Emissions Calculation Methodology: The emission calculations are based upon VOC content of the material used. The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank.

Regulation 2.17, section 5.2 requires sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulations 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The source is required to conduct a monthly visible emission survey and maintain records of the results to assure ongoing compliance with the opacity standard.

iii. **PM**

Regulations 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

Emissions Calculation Methodology: The emission calculations are based upon the throughput of HAP containing material used and weight percent of the HAP.

- 1) Regulation 2.17, section 5.2 establishes requirements to include permit terms and conditions to assure that the plant-wide emissions from a source remain below the major source threshold levels.
- 2) The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart CCCCCC.

e. **Reporting**

i. **VOC**

Regulation 2.17, section 5.2 requires reporting to assure compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulations 6.09 and 7.08 do not require any specific reporting requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any deviation from the requirement to perform monthly VE surveys or Method 9 tests and the occurrences of VE surveys where visible.

iii. **PM**

Regulations 6.09 and 7.08 do not require any specific reporting requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

- 1) Regulation 2.17, section 5.2 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit.
- 2) The source is required to comply with applicable reporting requirements of 40 CFR Part 63, Subpart CCCCCC.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Alternative Operating Scenarios:** The source did not request to operate under any alternative operating scenarios.
5. **Compliance Status:** Color Corporation of America is currently in compliance.

- 6. Compliance History:** The source submitted a signed FEDOOP compliance certification on April 15, 2014.

Incident Date(s)	Regulations Violated	Result
12/06/2010	2.17	Settled

7. Insignificant Activities

Description	Quantity	Basis
Natural Gas 4.2 MMBTU/hr Boiler	1	Regulation 1.02, Appendix A, section 1.1

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.